

# **Exhibit 10**

1                   IN THE UNITED STATES DISTRICT COURT  
2                   FOR THE DISTRICT OF SOUTH CAROLINA  
3                   COLUMBIA DIVISION  
4                   CASE NO. 3:21-CV-03302-MBS-TJH-RMG

5                   THE SOUTH CAROLINA STATE CONFERENCE OF  
6                   THE NAACP, AND TAIWAN SCOTT, ON BEHALF  
7                   OF HIMSELF AND ALL OTHER SIMILARLY  
8                   SITUATED PERSONS,

9                                 Plaintiffs,

10                                vs.

11                   THOMAS C. ALEXANDER, HENRY D. MCMASTER,  
12                   IN HIS OFFICIAL CAPACITY AS GOVERNOR OF  
13                   SOUTH CAROLINA; HARVEY PEELER, IN HIS  
14                   OFFICIAL CAPACITY AS PRESIDENT OF THE  
15                   SENATE; LUKE A. RANKIN, IN HIS OFFICIAL  
16                   CAPACITY AS CHAIRMAN OF THE SENATE  
17                   JUDICIARY COMMITTEE; JAMES H. LUCAS, IN  
18                   HIS OFFICIAL CAPACITY AS SPEAKER OF THE  
19                   HOUSE OF REPRESENTATIVES; CHRIS MURPHY,  
20                   IN HIS OFFICIAL CAPACITY AS CHAIRMAN OF  
21                   THE HOUSE OF REPRESENTATIVES JUDICIARY  
22                   COMMITTEE; WALLACE H. JORDAN, IN HIS  
23                   OFFICIAL CAPACITY AS CHAIRMAN OF THE  
24                   HOUSE OF REPRESENTATIVES ELECTIONS LAW  
25                   SUBCOMMITTEE; HOWARD KNABB, IN HIS  
                    OFFICIAL CAPACITY AS INTERIM EXECUTIVE  
                    DIRECTOR OF THE SOUTH CAROLINA STATE  
                    ELECTION COMMISSION; JOHN WELLS, JOANNE  
                    DAY, CLIFFORD J. ELDER, LINDA MCCALL,  
                    AND SCOTT MOSELEY, IN THEIR OFFICIAL  
                    CAPACITIES AS MEMBERS OF THE SOUTH  
                    CAROLINA STATE ELECTION COMMISSION,

                                  Defendants.

20                   DEPOSITION OF:     ANDREW THEODORE FIFFICK  
21   (Appearing via VTC)

22                   DATE:                         July 21, 2022

23                   TIME:                         10:10 a.m.

<p style="text-align: right;">Page 2</p> <p>1 LOCATION: Robinson Gray, LLC 1310 Gadsden Street 2 Columbia, South Carolina 3 TAKEN BY: Counsel for the Plaintiffs 4 REPORTED BY: KAREN M. ERNST, CSR (Appearing via VTC) 5 _____ 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25</p>	<p style="text-align: right;">Page 4</p> <p>1 APPEARANCES CONTINUED: 2 ATTORNEYS FOR ELECTION DEFENDANTS: 3 BURR &amp; FORMAN, LLP 4 BY: MICHAEL L. BURCHSTEAD JANE W. TRINKLEY (Appearing via VTC) 5 1221 Main Street, Suite 1800 Columbia, South Carolina 29201 6 803-753-3261 mburchstead@burr.com. 7 jtrinkley@burr.com 8 ALSO PRESENT: 9 CYNDI NYGORD SONORA CARROLL 10 RICK ROZOS MADISON VILLARREAL (Appearing via VTC) 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25</p>
<p style="text-align: right;">Page 3</p> <p>1 APPEARANCES OF COUNSEL: 2 ATTORNEYS FOR PLAINTIFFS: THE SOUTH CAROLINA STATE CONFERENCE OF 3 THE NAACP, ET AL: 4 NAACP LEGAL DEFENSE AND EDUCATIONAL FUND 5 BY: LEAH C. ADEN RAYMOND AUDAIN 6 (Appearing via VTC) 40 Rector Street, 5th Floor 7 New York, New York 10006 212-965-7715 laden@naacpldf.org raudain@naacpldf.org 8 9 ATTORNEYS FOR DEFENDANTS 10 SENATOR THOMAS C. ALEXANDER AND SENATOR LUKE A. RANKIN: 11 12 ATTORNEYS FOR DEPONENT ANDREW THEODORE FIFFICK: 13 ROBINSON GRAY, LLC BY: ROBERT E. TYSON 14 VORDMAN CARLISLE TRAYWICK, III (Appearing via VTC) 15 1310 Gadsen Street Columbia, South Carolina 29201 16 803-929-1400 rtyson@robinsongray.com ltraywick@robinsongray.com 17 18 ATTORNEYS FOR HOUSE DEFENDANTS: NEXSEN PRUET, LLC 19 BY: JENNIFER HOLLINGSWORTH MICHAEL PARENTE 20 (Appearing via VTC) 1230 Main Street, Suite 700 21 Columbia, South Carolina 29201 803-253-8247 jhollingsworth@nexsenpruet.com 22 Mparente@nexsenpruet.com 23 24 25</p>	<p style="text-align: right;">Page 5</p> <p>1 THE REPORTER: Can I get appearances, 2 please. 3 MS. ADEN: So I'm Leah Aden, A-d-e-n, 4 and I'm appearing for the plaintiffs with the NAACP 5 Legal Defense Fund. My colleague Raymond -- 6 Do you mind introducing yourself? 7 MR. AUDAIN: Raymond Audain, 8 A-u-d-a-i-n. I'm also here for plaintiffs, and I 9 work with Leah at the Legal Defense Fund. 10 MR. TYSON: Good morning, Karen. I'm 11 Rob Tyson. I'm counsel for Senator Alexander and 12 Senator Rankin, and I'm here with the deponent, 13 Andy Fiffick. 14 MS. HOLLINGSWORTH: It's Jennifer 15 Hollingsworth. I represent the House Defendants. 16 MR. TYSON: Jennifer, you sound 17 horrible when you talk, just so you know. 18 MS. HOLLINGSWORTH: Okay. Thank you. 19 I'll do my best not to talk. 20 MR. BURCHSTEAD: I'm Michael Burchstead 21 here on behalf of the Election Defendants. 22 MR. TRAYWICK: Lisle Traywick here also 23 on behalf of the Senate Defendants. 24 MS. ADEN: And I wanted to flag that 25 Sonora Carroll, who appears in the chat, is a legal</p>

<p style="text-align: right;">Page 38</p> <p>1 gerrymandering claims?</p> <p>2 A. I'm sure there was but I don't really</p> <p>3 specifically recall it, no.</p> <p>4 Q. Was there discussion of intentional</p> <p>5 racial discrimination in voting claims?</p> <p>6 A. I don't remember any discussion about</p> <p>7 that. I mean, there could have been but that's so</p> <p>8 beyond the pale that I don't think they brought</p> <p>9 that up that I can recall.</p> <p>10 Q. And when you communicated with</p> <p>11 Mr. Terreni in, you believe, starting on or around</p> <p>12 in October, how did you primarily communicate with</p> <p>13 him?</p> <p>14 A. We would all sit in the map room, which</p> <p>15 was in Luke Rankin's office, with a map projected</p> <p>16 on the wall, whatever map that might be from</p> <p>17 whatever member who requested it and it was sort of</p> <p>18 a discussion amongst myself, Will Roberts, Breeden</p> <p>19 John, Paula Benson here and there, Maura Baker here</p> <p>20 and there.</p> <p>21 Q. How many computers were in that room?</p> <p>22 A. One.</p> <p>23 Q. And besides the map -- so was the map</p> <p>24 on the computer screen or was the map projected on</p> <p>25 the wall off of the computer?</p>	<p style="text-align: right;">Page 40</p> <p>1 A. Yeah. It was, you know, the population</p> <p>2 deviations. There was political data.</p> <p>3 Occasionally there was demographic data so, yeah,</p> <p>4 that stuff was up there for sure.</p> <p>5 Q. And when you refer to demographic data,</p> <p>6 are you referring to something else other than</p> <p>7 population?</p> <p>8 A. We saw VDOT numbers occasionally if a</p> <p>9 member asked for them. I don't recall Senator</p> <p>10 Campsen ever asking for that. I think Senator Sabb</p> <p>11 and I think Senator Bright Matthews might have.</p> <p>12 But those were available. I mean, and those were</p> <p>13 also things we produced on the website so the</p> <p>14 public could see as well.</p> <p>15 Q. You were in the room with Mr. Roberts</p> <p>16 as he was drawing maps sometimes or did you see</p> <p>17 them after he had completed drawing them?</p> <p>18 A. I'm sure there were some things that he</p> <p>19 drew when I was not around, but a lot of the time I</p> <p>20 was there in the room as he was drawing. I mean,</p> <p>21 bear in mind I've got seven, you know, staff</p> <p>22 attorneys, you know, a dozen law clerks, and 350</p> <p>23 bills that were in my committee at the time so I</p> <p>24 wasn't with him all the time, but much of the time</p> <p>25 I would say.</p>
<p style="text-align: right;">Page 39</p> <p>1 A. The map was being projected off of the</p> <p>2 computer onto the wall. We set that up so that a</p> <p>3 member could come in and see. But we also used it,</p> <p>4 you know, when we were drawing maps in preparation</p> <p>5 for something that a member to ask. A member was</p> <p>6 not always sitting there, you know, the whole time</p> <p>7 we drew a map. They would ask for something, Will</p> <p>8 would draft a map, and then we would present it to</p> <p>9 the member, and then like I said, we'd share it</p> <p>10 with outside counsel with Mr. Terreni and Mr. Gore</p> <p>11 for their analysis.</p> <p>12 Q. And you don't recall there being two</p> <p>13 computer monitors in that room?</p> <p>14 A. Two monitors, no, not in the map room</p> <p>15 for congressional, no. There was one big screen.</p> <p>16 Q. And what was on the computer screen?</p> <p>17 Was it the same image being projected or were there</p> <p>18 windows with other information?</p> <p>19 A. It was the same as being projected.</p> <p>20 That was the whole purpose. I mean, we called that</p> <p>21 Will driving. We would see what he could see on</p> <p>22 his laptop on the wall. It was probably a ten by</p> <p>23 ten projection onto the wall.</p> <p>24 Q. When you looked at maps, was there ever</p> <p>25 data up on the screen that coincided with the maps?</p>	<p style="text-align: right;">Page 41</p> <p>1 Q. And did you observe Mr. Roberts looking</p> <p>2 at racial data as he was drawing proposed</p> <p>3 congressional maps?</p> <p>4 A. As he was drawing, I don't recall that,</p> <p>5 but I do know he would have had access. He would</p> <p>6 have seen it. I mean, yeah. I mean, yeah. Sure.</p> <p>7 It's very possible.</p> <p>8 Q. Do you know where that data came from?</p> <p>9 A. I don't. I think -- I guess it came</p> <p>10 from the census. I mean, I think Will and Breeden</p> <p>11 aggregated that stuff and then there may have been</p> <p>12 some -- I don't recall where that came from. I</p> <p>13 think it came from the Senate because I think</p> <p>14 that's all census information.</p> <p>15 Q. And you mentioned some political data.</p> <p>16 What are you referring to?</p> <p>17 A. The numbers for Trump and Biden in a</p> <p>18 given area.</p> <p>19 Q. So just one election, the 2020</p> <p>20 election?</p> <p>21 A. Yeah. We didn't look back farther than</p> <p>22 that, I don't believe, because I think there was</p> <p>23 something about the way the absentee ballots were</p> <p>24 put together. So the prior stuff -- 2016 wasn't</p> <p>25 accurate so we didn't go any farther back than that</p>

<p style="text-align: right;">Page 42</p> <p>1 at least that I know of.</p> <p>2 Q. Where did you get the political data?</p> <p>3 A. I want to say -- I can't remember</p> <p>4 specifically. I think there may have been an</p> <p>5 outside consultant that helped with that, but I</p> <p>6 think ultimately it came from -- I would guess it</p> <p>7 came from the election commission and then we</p> <p>8 had -- I mean, I guess that's where it came from.</p> <p>9 That's my recollection.</p> <p>10 Q. Did you specifically request data for</p> <p>11 anyone that was used for the development of the</p> <p>12 congressional map making?</p> <p>13 A. I did not, no.</p> <p>14 Q. Are you aware of who requested data for</p> <p>15 congressional map making?</p> <p>16 A. I assume Will got that from the</p> <p>17 election commission website. I mean, that's pretty</p> <p>18 easy stuff. I think that's where he got it from.</p> <p>19 Q. And so you mentioned population</p> <p>20 deviation numbers, political data, specifically the</p> <p>21 2020 election results, and you mentioned</p> <p>22 demographic data, specifically black voting age,</p> <p>23 population data. Was there any other data</p> <p>24 available to you in the room when you were --</p> <p>25 A. Oh, yeah. Sure. I mean, y'all have</p>	<p style="text-align: right;">Page 44</p> <p>1 him or vice versa or were you equal colleagues?</p> <p>2 How would you define that working relationship?</p> <p>3 A. I would call us equal colleagues in</p> <p>4 terms of the administrative situation, but I would</p> <p>5 say that, you know, having known him and knowing</p> <p>6 that he's been a lawyer for 20 years longer than</p> <p>7 me, I defer to him on anything because I trust him.</p> <p>8 He's a smart guy. I mean, technically speaking, if</p> <p>9 you look at a command chain, you know, I'm chief of</p> <p>10 staff. We hired Charlie, but, you know, the</p> <p>11 practical matter this is his third redistricting</p> <p>12 and my first. Colleagues with great deference to</p> <p>13 him I would say.</p> <p>14 Q. And in terms of hierarchy, is it fair</p> <p>15 to say the decision of Mr. Gore trumped the</p> <p>16 decision of both you and Mr. Terreni with respect</p> <p>17 to congressional mapping?</p> <p>18 A. If it came down to it, yes, but I don't</p> <p>19 recall a situation where Charlie Terreni disagreed</p> <p>20 with John Gore. So as a practical matter, yes, we</p> <p>21 would have gone up the food chain to the DC</p> <p>22 lawyers, but in reality, I don't remember that ever</p> <p>23 happening.</p> <p>24 Q. And how would you describe your working</p> <p>25 relationship with Mr. Breeden? Did he report to</p>
<p style="text-align: right;">Page 43</p> <p>1 got the exhibits that you've got here. I can't</p> <p>2 remember off the top of my head. There was massive</p> <p>3 amounts of data available, yes.</p> <p>4 Q. Okay. I'm glad we dived into</p> <p>5 substance, but I'm going to take us back for just a</p> <p>6 second and try to understand a little bit more</p> <p>7 about how you prepared for today's deposition and</p> <p>8 then we'll drill down on some of what we've already</p> <p>9 started to explore.</p> <p>10 A. Cool.</p> <p>11 Q. When were you first contacted by</p> <p>12 counsel about potentially being deposed in this</p> <p>13 case?</p> <p>14 A. I don't recall. I mean, it was a</p> <p>15 given. It was a given. But, I mean, I don't</p> <p>16 recall because I knew I would be.</p> <p>17 Q. Because of the filing of the complaint?</p> <p>18 A. Yeah. I mean, I figured with my role,</p> <p>19 my title, where I worked, I figured I was going to</p> <p>20 be deposed. I don't remember when I first heard</p> <p>21 about it but, yeah.</p> <p>22 Q. Let me ask you about the -- maybe I'll</p> <p>23 just be going back and forth as you jog my memory</p> <p>24 about things. How would you describe your</p> <p>25 relationship with Mr. Terreni? Did you report to</p>	<p style="text-align: right;">Page 45</p> <p>1 you?</p> <p>2 A. Yes.</p> <p>3 Q. And Mr. Roberts, did he also report to</p> <p>4 you?</p> <p>5 A. Yes.</p> <p>6 Q. And what about Ms. Benson?</p> <p>7 A. She technically does report to me, but</p> <p>8 it's a similar relationship with Charlie Terreni</p> <p>9 that she's been doing this, not just this, but off</p> <p>10 in the Senate for 35 years. Technically, on a</p> <p>11 chart she reports to me, but great deference on my</p> <p>12 part because of her level of experience.</p> <p>13 Q. What did you do to prepare for today's</p> <p>14 deposition?</p> <p>15 A. I met with Rob Gore -- I mean Rob Tyson</p> <p>16 and Lisle Traywick and John Gore what, now, was it</p> <p>17 twice, I believe, Rob?</p> <p>18 Q. When was that?</p> <p>19 A. This week. Monday and Tuesday of this</p> <p>20 week and then they presented me with a notebook</p> <p>21 that I went through yesterday with I think John</p> <p>22 Gore was here for most of that meeting. The rest</p> <p>23 of the time it was just me and Lisle and Rob.</p> <p>24 Q. And how long were each of those two</p> <p>25 meetings approximately?</p>

<p style="text-align: right;">Page 138</p> <p>1 A. Yeah, sure.</p> <p>2 Q. Are you aware of any instruction by any</p> <p>3 member of the legislature or anyone else that you</p> <p>4 and the team developing maps should be drawing six</p> <p>5 districts of the seven that lean Republican and</p> <p>6 one district of the seven that leans Democrat?</p> <p>7 A. I don't recall anybody asking for that,</p> <p>8 but that doesn't mean we didn't have it. That</p> <p>9 wasn't something that I remember.</p> <p>10 Q. Who would have been told to do that if</p> <p>11 it had been told?</p> <p>12 A. It would have been articulated to, you</p> <p>13 know, one of us in the map room or all of it at the</p> <p>14 same time in the map room. And so much of our</p> <p>15 drafting was in realtime with the members, so it</p> <p>16 would have been -- the most common way for any of</p> <p>17 those instructions to occur would be in realtime in</p> <p>18 the map room, either Zooming with a member of the</p> <p>19 general assembly -- or a member of the Senate or</p> <p>20 with a member of the Senate in the office.</p> <p>21 I don't recall that happening. You're</p> <p>22 saying six Republican and one Democrat. I don't</p> <p>23 remember that being...</p> <p>24 Q. In looking at the guidelines in front</p> <p>25 of you, do you see that as a criteria identified in</p>	<p style="text-align: right;">Page 140</p> <p>1 Q. Outside of the map room, were you</p> <p>2 present when Senator Campsen relayed that as a</p> <p>3 priority of his on the floor of the legislature?</p> <p>4 A. I can't remember if he did or not. I</p> <p>5 don't remember.</p> <p>6 Q. Do you know if the public was aware</p> <p>7 that that was a priority of Senator Campsen when he</p> <p>8 was developing congressional maps?</p> <p>9 A. I think so, because a lot of people</p> <p>10 wanted it the exact opposite. It was a Republican-</p> <p>11 Democrat thing. But the folks that wanted to make</p> <p>12 Charleston all within one district weren't</p> <p>13 necessarily going to make CD1 a Democratic</p> <p>14 district. And the Republicans, vice versa.</p> <p>15 Q. What's that based on?</p> <p>16 A. Trump/Biden data. It was political</p> <p>17 data that was loaded in the software.</p> <p>18 Q. And who provided that political data?</p> <p>19 A. I forget the name of the consultant</p> <p>20 that did that, but something had to be -- some sort</p> <p>21 of census information or election commission data</p> <p>22 or something. We had some outside consultant, I</p> <p>23 think, that aggregated that stuff and put it in a</p> <p>24 format that it could be used in maps. I'm not sure</p> <p>25 who that was.</p>
<p style="text-align: right;">Page 139</p> <p>1 this document?</p> <p>2 A. No. No. I mean, I -- no, I don't. I</p> <p>3 guess I'd go back to that other question. No one</p> <p>4 articulated it the way you're articulating it, six</p> <p>5 and one, but there were people that said I want,</p> <p>6 you know, the 1st district to stay Republican or</p> <p>7 lean Republican.</p> <p>8 Q. Who were those people?</p> <p>9 A. Senator Campsen, I believe, felt that</p> <p>10 was important. And I think the rest of the</p> <p>11 Republican majority voted the final way they voted</p> <p>12 because they felt it was important.</p> <p>13 Q. When did Senator Campsen relay that he</p> <p>14 wanted CD1 to stay Republican?</p> <p>15 A. I'm sure it would have been when we</p> <p>16 were doing maps in November, December, you know,</p> <p>17 during that subcommittee timeframe. It was</p> <p>18 never -- I don't think he wanted it skewed; I just</p> <p>19 don't think he wanted it -- he felt that having two</p> <p>20 members of congress in Charleston was a good thing.</p> <p>21 And as a part of that, we also met with</p> <p>22 Senator Clyburn in Charleston. I think he thought</p> <p>23 that was a good thing too because he's a powerful</p> <p>24 guy. And that dovetailed with his desire to keep</p> <p>25 Charleston Republican.</p>	<p style="text-align: right;">Page 141</p> <p>1 Q. Are you aware of whether that data was</p> <p>2 provided on the Senate Redistricting website?</p> <p>3 A. I think it was, yeah. I think we did</p> <p>4 have political data.</p> <p>5 Q. And you were not involved in any</p> <p>6 analysis of that data?</p> <p>7 A. No, I wasn't.</p> <p>8 Q. We were talking about communities of</p> <p>9 interest before the break, and as I understand from</p> <p>10 your testimony today, you participated in the</p> <p>11 public hearings. Do you recall -- is it fair to</p> <p>12 say there were about ten public hearings over the</p> <p>13 summer?</p> <p>14 A. I think that's close, yeah.</p> <p>15 Q. And do you know how the redistricting</p> <p>16 committee chose which counties to hold those</p> <p>17 hearings in?</p> <p>18 A. I think we just looked at the most, you</p> <p>19 know, central populus areas and areas that had a</p> <p>20 tech school in the area because the tech schools,</p> <p>21 that's what we used almost exclusively. I think</p> <p>22 all of our meetings were held at a tech school</p> <p>23 except for maybe one just because they were very</p> <p>24 accommodating and had an auditorium.</p> <p>25 I think that was major population areas</p>



<p style="text-align: right;">Page 266</p> <p>1 recall this bit. I think he was trying to decide 2 how many people in Daniel Island. 3 Q. Was it common for Senator Campsen to 4 use his personal Gmail to correspond about 5 congressional redistricting? 6 A. No, huh-uh. I mean, not that I can 7 recall. He didn't do a lot of email so, no. 8 Q. Were you involved in the preparation of 9 the data reported here? 10 A. No. 11 Q. Do you know why there was a focus on 12 Charleston and Daniel Island? 13 A. Because that's the area that Chip 14 Campsen represents. 15 MS. ADEN: Raymond, I'm not sure if 15 16 is the right document that you've uploaded into 17 Exhibit Share. It's South Carolina Senate 22549, 18 22550, which you might see at the end. Are you 19 hearing me because I can't hear you. 20 MR. AUDAIN: Yeah, I'm hearing you. 21 We're at 13. You said tab 70? 22 MS. ADEN: Yes. Oh, wait. I 23 understand why. I somehow got into the wrong 24 folder. 25 Can we go off the record for just two</p>	<p style="text-align: right;">Page 268</p> <p>1 Q. And the counties include Charleston, 2 Berkeley, Dorchester, and Beaufort? 3 A. Yes. 4 Q. And the plans considered are the 5 Benchmark 2011 plan, the Senate Staff Plan, the 6 House Judiciary Plan, and the House Judiciary Plan 7 Senate Amendment 1? 8 A. Yes. 9 MR. TYSON: Leah, I don't know, did you 10 say Benchmark 2011? 11 MS. ADEN: Sorry, 2020. Thank you for 12 correcting me. Benchmark 2020. 13 BY MS. ADEN: 14 Q. Is it Benchmark 2020 or does it 15 actually say? But would you assume that it would 16 be or do you know? 17 A. With the number that, I would assume it 18 would be. I don't know. I couldn't tell you from 19 this document. 20 Q. Looking at all of the measures -- and I 21 want to focus on the Trump column -- does it 22 reflect that in all of the plans compared -- and 23 again, we don't know which benchmark we're 24 referring to, but between the plans compared, that 25 in Charleston, Berkeley, Dorchester, and Beaufort,</p>
<p style="text-align: right;">Page 267</p> <p>1 minutes? I want to make sure I'm in the right 2 folder. 3 THE REPORTER: Yes. 4 MS. ADEN: Okay. I'm back. Thank you. 5 BY MS. ADEN: 6 Q. If you could look at the document 7 titled 2250 or Bates stamped 22550, I apologize. 8 A. I don't see one marked that, but it's 9 the next page, I assume. 10 Q. Yeah, I think it fell off. I apologize 11 for that too. South Carolina Senate 22550. 12 A. Yep. I've got it. 13 Q. What information is this chart 14 reporting? 15 A. It looks like it's got -- is it maybe 16 that 19,000 people or subtracted 19,000 people from 17 Charleston and Daniel Island? Looks to be 18 comparisons population. 19 Q. So the DI in the second set of data on 20 the bottom, DI is referring to Daniel Island? 21 A. I think so. 22 Q. And does it look like it's reporting 23 the population numbers and Trump support in several 24 counties under various plans? 25 A. Yes, it is.</p>	<p style="text-align: right;">Page 269</p> <p>1 that the Trump share of the vote increased from the 2 Benchmark Plan? 3 A. Yes. I think you can see. 4 Q. From 53 percent to over 54 percent in 5 some of those areas? 6 A. Yes. 7 Q. And it looks like under both measures, 8 the top columns -- the top rows and the bottom 9 rows, that the population of Charleston is reduced 10 significantly from the Benchmark Plans or reduced? 11 A. Yes. I think so. 12 Q. Is this the type of political data that 13 we've been discussing this afternoon that was 14 reported with plans that you and others who were 15 working on plans would provide? 16 A. Sure. Yeah. 17 Q. Did you attend the meeting where this 18 information -- was there a meeting where this 19 information was shared to Senator Campsen? 20 A. I don't recall whether this was 21 something we shared with him at a meeting or got 22 to -- I'm sure at some point he talked with us 23 about it, I'd say. He wouldn't have just received 24 this information cold and not discussed it at some 25 point.</p>